



**Farmers Mutual Telephone Cooperative of Shellsburg**

124 Main Street, P.O. Box 389, Shellsburg, IA 52332 (319)436-2224 - Fax (319) 436-2228

DOCKET FILE 06-36-0012

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February 3, 2010

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**Re: CPNI Certification [Section 64.2009(e) (amended) of FCC Rules]  
EB Docket No. 06-36**

Dear Ms. Dortch:

Enclosed please find the Annual CPNI Certification, [Section 64.2009(e)(amended) of FCC Rules], EB Docket 06-36 and accompanying statement.

If you have any questions, please feel free to contact me.

Sincerely,

Roy Fish  
Board President  
Farmers Mutual Telephone Cooperative

cc: FCC Enforcement Bureau  
Best Copy and Printing, Inc.

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**Annual 47 C.F.R. S: 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 3, 2010

Name of company covered by this certification: Farmers Mutual Telephone Cooperative

Form 499 Filer ID: 801720

Name of signatory: Roy M. Fish

Title of signatory: Board President

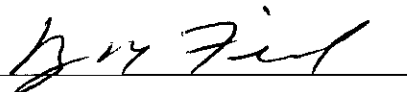
I, Roy M. Fish, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



Farmers Mutual Telephone Cooperative  
Certification of CPNI Filing Attached Statement  
February 3, 2010

1. Farmers Mutual Telephone Cooperative has established CPNI Compliance Officers.
2. Farmers Mutual Telephone Cooperative does not use CPNI for marketing purposes.
3. Farmers Mutual Telephone Cooperative personnel are trained as to what information is classified as CPNI and do not use CPNI for Marketing Purposes. All departments have read and have access to a CPNI Manual.
4. Farmers Mutual Telephone Cooperative has implemented appropriate safeguard policies for CPNI and has documented them in the Farmers Mutual Telephone procedures for training personnel.
5. Farmers Mutual Telephone Cooperative is submitting the CPNI Compliance Certificate in response to the Public Notice issued by the FCC on February 2, 2006 in DA 06-258, pursuant to Section 64.2009(e) of FCC rules.

## **CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES**

Mark A. Harrison signs this Certificate of Compliance in accordance with Section 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's Code of Federal Regulations (CFR) Title 47 §64.2009, on behalf of Farmers Mutual Telephone Cooperative. This Certificate of Compliance addresses the requirement of FCC's (CFR) Title 47 §64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with FCC's (CFR) Title 47 §64.2001-.2011.

On behalf of the Company, I certify as follows:

1. I am the General Manager of the Company. My business address is:  
124 Main St.  
Shellsburg, IA 52332
2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to customer proprietary network information (CPNI).
3. The Company has established a system by which the status of a customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.
4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself or Nancy Seely the Company's Customer Service Manager. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.

**CERTIFICATE OF COMPLIANCE WITH PROTECTION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION RULES(Cont'd)**

6. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.
7. The Company's policy is to maintain records of a CPNI breach for a minimum of two years. These records will include a description of the steps the company took to prevent the breach, how the breach occurred, the impact of the breach and proof of notification to law enforcement and the customer, if applicable.
8. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI must first consult with myself or Nancy Seely regarding the lawfulness of using CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either Nancy Seely, or I consult one or more of the following: The Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from either Nancy Seely or I regarding any proposed use of CPNI.
9. Further, both Nancy Seely and I personally oversee the use of opt-in, opt-out, or any other approval requirements or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. I also review all notices required by the FCC regulations for compliance therewith.
10. Nancy Seely and I also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.
11. Both Nancy Seely and I personally oversee completing and submitting EB Docket No. 06-36, which is due on or before March 1 each year. The form includes explanation of any action taken against data brokers, a summary of all customer complaints, and an explanation of breaches.



Signature  
Farmers Mutual Telephone Cooperative

February 3, 2010